

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEBRASKA

DENEISE INGRAM, as Legal Guardian for
KAREN CHANDLER,

Plaintiff,

v.

COVENANT CARE MIDWEST, INC., d/b/a
NEBRASKA SKILLED NURSING AND
REHABILITATION and COVENANT CARE,
INC.,

Defendants.

No. 8:09-CV-110

**AFFIDAVIT OF HEATHER H.
ANSCHUTZ IN SUPPORT OF
DEFENDANTS' OPPOSITION TO
PLAINTIFF'S MOTION TO COMPEL**

STATE OF NEBRASKA)
) SS. HEATHER H. ANSCHUTZ
COUNTY OF DOUGLAS)

I, Heather H. Anschutz, being first duly sworn, hereby depose and state the following in support of Defendants' Covenant Care Midwest, Inc., d/b/a Nebraska Skilled Nursing and Rehabilitation and Covenant Care, LLC's ("Defendants") Opposition to Plaintiff's Motion to Compel ("Opposition"):

1. I am an associate of the law firm of Kutak Rock LLP and counsel for Defendants in the above-captioned matter and have personal knowledge of the information contained herein.

2. Attached hereto and identified on Defendants' Index of Evidence filed in support of Defendants' Opposition and marked as Exhibits A through G are true and accurate copies of the following documents:

- (a) Exhibit A – Relevant portions of testimony from the deposition of Lucille Williams, taken on April 1, 2010, and Exhibit 6 thereto;
- (b) Exhibit B – Relevant Therapy Records from the Nebraska Skilled Nursing and Rehabilitation medical chart for Karen Chandler;
- (c) Exhibit C – Relevant Nursing Records from the Nebraska Skilled Nursing and Rehabilitation medical chart for Karen Chandler;
- (d) Exhibit D – Relevant portions of testimony from the deposition of Deniese Ingram, taken on November 20, 2009, and Exhibit 3 thereto;
- (e) Exhibit E – Defendants' Discovery Responses served on September 25, 2009;
- (f) Exhibit F – Defendants' Letter to Plaintiff, dated January 5, 2010; and
- (g) Exhibit G – Defendants' Supplemental Responses to Plaintiff's Discovery, dated April 30, 2010.

FURTHER AFFIANT SAYETH NOT.


HEATHER H. ANSCHUTZ

Subscribed and Sworn to before me this 30th day of April, 2010.


Notary Public

